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Centel Corporation  
Beatrice MGP Site

B&V Project 143927.412  
B&V File A04B  
June 4, 2009

Kevin Larson  
U.S. Environmental Protection Agency - Region 7  
Superfund Division  
901 North 5<sup>th</sup> Street  
Kansas City, KS 66101



Subject: Addendum No. 2 to the EE/CA Work Plan –  
BNSF Property Investigation

Dear Kevin:

Because of issues associated with access to the BNSF Railway Company (BNSF) property east of the Beatrice former manufactured gas plant (MGP) Site, several of the soil probes, groundwater probes, and monitoring wells proposed in the September 2007 Engineering Evaluation/Cost Analysis (EE/CA) Work Plan were not able to be advanced. However, ongoing communication between BNSF and the EPA may result in BNSF granting access to their property to perform environmental sampling associated with the MGP Site investigation. This addendum to the Work Plan presents rationale for probe and well locations on the BNSF property so that conditions upgradient of the MGP Site can be more fully evaluated. The proposed locations of the soil and groundwater probes and monitoring wells are shown on Figure 1, and are the same locations as originally proposed in the EE/CA Work Plan although the numbering has changed and three groundwater probes and one monitoring well have been added.

#### Soil Probes

Soil probes SP-119, SP-120, and SP-121 will be advanced along the eastern boundary of the MGP Site and on BNSF property to determine soil conditions between suspected upgradient contaminant sources and the Site. Each probe will be advanced to the top of bedrock, which is estimated to be 20 to 35 feet. Soil samples will be collected from three intervals (1 to 6 foot, 6 to 12 foot, and 12 foot to the top of the groundwater surface or bedrock). No soil samples will be collected below the groundwater table. Soil samples will be collected as described in the EE/CA Field Sampling Plan (FSP), and will be analyzed for benzene, toluene, ethylbenzene, and total xylenes (BTEXs), polynuclear aromatic hydrocarbons (PAHs), selected metals (arsenic, barium, cadmium, chromium, lead), and cyanide. Upon completion, the soil probes will be backfilled with bentonite and the original ground surface restored. Up to three additional soil probes may be advanced based on Site conditions and/or contamination encountered.

#### Groundwater Probes

Groundwater probes GWP-118, GWP-119, and GWP-120 will be advanced on BNSF property between the Site and historical oil storage facilities to determine the presence of any suspected petroleum hydrocarbon contamination upgradient of the MGP Site. Groundwater probes GWP-121, GWP-122, and GWP-123 are proposed along the eastern edge of the BNSF property to evaluate groundwater contamination upgradient of the historical oil storage facilities. Each probe will be advanced to the top of bedrock using the same method established during the July 2008 investigation. Groundwater samples will be collected at or near the groundwater table, and at or near the bedrock interface. The probes will be sampled as described in the FSP, and the groundwater samples will be analyzed for BTEXs and PAHs. Upon completion, the groundwater probes will be backfilled with bentonite and the original ground surface restored. Up to three

additional groundwater probes may be advanced based on site conditions and/or contamination encountered.

Monitoring Wells

Wells MW-04 and MW-05 are proposed to be installed on BNSF property east and southeast of the Site to define groundwater flow and upgradient conditions, and to monitor suspected contamination conditions prior to contact with the Site. Monitoring well MW-06 is proposed to be installed on BNSF property upgradient of the MGP Site and historical oil storage facilities. The final locations of the monitoring wells will be based on site conditions and groundwater probe data collected during this and the July 2008 EE/CA investigations. Because existing well MW-02 is located on BNSF property, access to this well for collecting groundwater level measurements and sampling will also be requested from BNSF. The monitoring wells will be installed as defined in the FSP with 10-foot screens and flush-mount completions, similar to existing well MW-02. Following installation, the monitoring wells will be developed and sampled as described in the EE/CA Work Plan and FSP. Groundwater samples will be analyzed for BTEXs, PAHs, selected metals, and cyanide.

Based on your concurrence and an acceptable access agreement from BNSF, the remaining EE/CA field investigation activities will be scheduled as outlined in this addendum letter. As required under the Administrative Settlement Agreement and Order on Consent, the EPA will be notified at least 5 working days prior to performing any field activities.

Please let us know if you need any additional information or if we can be of any assistance in your ongoing communication with BNSF. You are welcome to call Mr. Brian Wiedower, the Centel project coordinator, at (913) 315-8631, or Gordon Abell at (913) 458-6542 if you have any questions regarding this addendum to the EE/CA Work Plan.

Very truly yours,

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Mark G. Snyder, BCEE, D.WRE  
Senior Environmental Engineer and Project Manager

Enclosure

cc: (all w/ enclosure)  
Brian Wiedower  
Stephen M. Cole  
Ed Clement  
Scott Young  
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Project File

